

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE STONE #1; :
JANE STONE # 2; :
JANE STONE # 3; : Index No. 20-CV-1326 (RA)(OTW)
JANE STONE #4; :
JANE STONE # 5; : **DECLARATION OF**
JANE STONE # 6; : **CHRISTIAN NUNEZ**
:
Plaintiffs, :
:
-against- :
:
ANTHONY ANNUCCI, Acting :
Commissioner of the New York State :
Department of Corrections & Community :
Supervision, *et. al.*, :
:
Defendants. :
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CHRISTIAN NUNEZ, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I am not a defendant in this action and submit this declaration based upon my personal knowledge and a review of documents prepared by New York State Department of Corrections and Community Supervision (“DOCCS”) personnel in the ordinary course of business and maintained by DOCCS in the ordinary course of business, in support of supervisory defendants’ motion to dismiss, sever, and transfer venue.

2. I am currently employed by DOCCS as Deputy Chief, Office of Special Investigations: Sex Crimes Division (“OSI SCD”). In this capacity my responsibilities include supervision of all investigations involving sexual abuse and sexual harassment of inmates as well as investigations of inappropriate relationships involving staff with inmates and/or parolees. I am also responsible for ensuring that investigations conducted by the OSI SCD are compliant with the

standards set forth in the federal Prison Rape Elimination Act. I have held this position since May 2015.

3. Based upon my personal knowledge and a review of DOCCS records, six of the plaintiffs reside in New York State. Specifically: (i) Jane Stone # 1 was last known to be incarcerated in [REDACTED], New York; (ii) Jane Stone # 2 resides in [REDACTED], New York; (iii) Jane Stone # 3 resides in [REDACTED], New York; (iv) Jane Stone # 4 resides in [REDACTED], New York; (v) Jane Stone # 5 resides in [REDACTED]; and (vi) Jane Stone # 6 resides in [REDACTED], New York. All the plaintiffs are on parole except for Jane Stone # 1.



This document electronically signed by:
Deputy Chief Christian Nunez

CHRISTIAN NUNEZ

Executed on December 8, 2020